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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Crown Imports LLC,	:	Civil Action No. 17-4852 (JMV) (JBC)
	:	
Plaintiff,	:	Hon. John Michael Vazquez
	:	Hon. James B. Clark, III
v.	:	
	:	
R.R. Importaciones, Inc., James Martinez,	:	
and John Does 1-10,	:	
	:	
Defendants.	:	

Declaration of James Martinez

I, James Martinez, declare as follows:

1. I am an adult resident of the State of New Jersey and am competent to testify regarding the statements made in this Declaration. These statements are based on my own personal knowledge and experience.
2. I am a defendant in this action.
3. In 1986, I came to the United States of America.
4. Defendant R.R. Importaciones, Inc. ("RR Importers") is a corporation duly organized and existing under the laws of the State of New Jersey with its principal place of business at 141-143 3rd Street, Passaic, New Jersey.
5. During my employment with RR Importers, which ended in 2003, RR Importers

operated a warehouse and provided storage services for its clients' goods, which typically consisted of spices, dried peppers, and Mexican candy.

6. My brother Rolando Martinez ("Rolando") founded RR Importers and offered me a position with the company.

7. I accepted a supervisory position with RR Importers where I oversaw shipments and deliveries for RR Importers.

8. In addition to my supervisory duties, Rolando requested that I help manage RR Importers's accounts; I was therefore granted access to RR Importers's bank accounts. However, I was not, nor did I ever request to be, an officer or director of RR Importers.

9. During my employment with RR Importers, I regularly observed various RR Importers business documents naming Rolando as the owner of the company.

10. In or around 2003, I decided to resign my position with RR Importers due to disagreements with Rolando over personal matters unrelated to RR Importers.

11. Rolando notified me that, upon my resignation, all corporate documents for RR Importers would reflect my termination with the company. I have not had any involvement with RR Importers since 2003.

12. To the best of my knowledge, Rolando continues to own, operate, and manage RR Importers. I am not in regular contact with Rolando.


13. I have not been involved in the marketing, distribution, or sale of any alcoholic beverages since 2003.

14. If plaintiff Crown Imports LLC ("Plaintiff") dismisses me personally from this action based on the statements contained in this Declaration, and if any such statement is revealed to be false or if I have omitted any material facts relevant to this action, I understand

rights against me.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing statements are true and correct.

Dated: August 19, 2017


James Martinez